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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors
** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF THE UTILITY'S NON-
OPPOSITION TO MOTIONS BY
ADDITIONAL 19 HINKLEY
CLAIMANTS FOR RELIEF FROM THE
AUTOMATIC STAY**

[Related to Dkt. Nos. 8150 et seq.]¹

¹ Attachment 1 hereto (which is identical to Attachment 1 to the Tentative Ruling, as defined at ¶ 2 below) lists the names of the relevant moving parties and shows the docket numbers for their respective motions and the case numbers of their Ninth Circuit appeals.

Pacific Gas and Electric Company (the “**Utility**”), as debtor and debtor in possession in the above-captioned cases (the “**Chapter 11 Cases**”), hereby provides notice as follows regarding the additional nineteen (19) separate motions for relief from stay (the “**Motions**”) filed by the similarly situated individual movants identified on Attachment 1 (the “**Additional Hinkley Movants**”):

1. The Motions seek relief from the automatic stay to permit the Additional Hinkley Movants to proceed with appeals currently pending before the Ninth Circuit from the dismissal by the U.S. District Court for the Central District of California of civil actions that the Additional Hinkley Movants had brought against the Utility and, depending on the outcome of their appeals, to prosecute the underlying civil actions to judgment. The Court previously granted twenty-six (26) motions for relief from the automatic stay filed by several parties that were similarly situated to the Additional Hinkley Movants. *See* Docket No. 6998.

2. The Utility has reviewed the Order and Tentative Ruling on Motions for Relief from Stay, issued by the Court on June 29, 2020 [Docket No. 8208] (the “**Tentative Ruling**”).

3. In light of the Tentative Ruling, Debtors **DO NOT OPPOSE** the Motions, or the granting of relief from the automatic stay as requested in each of the Motions, **on the condition** that such grant of relief from stay does not permit the Additional Hinkley Movants to enforce any judgment they might obtain against the Utility, and that the Additional Hinkley Movants may recover any such judgment only through the claims process in these Chapter 11 Cases and in accordance with the terms of the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization dated June 19, 2020* [Docket No. 8048] (as may be modified, amended, or supplemented from time to time).

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Dated: June 30, 2020

Respectfully submitted,

WEIL, GOTSHAL & MANGES LLP
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By /s/ Peter J. Benvenutti
Peter J. Benvenutti

Attorneys for Debtors and Debtors in Possession